Hack51 Talent Account Privacy Notice

HACK51 AFRICA LTD · RC 8175907

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1. Who handles your data and what this notice covers

HACK51 AFRICA LTD ('Hack51', 'we' or 'us') is the data controller for the Talent account processing described here. Our registered office is 38 GFO Orim Street, Bebo (E1) Estate, Lemna C, Calabar, Cross River State, Nigeria. Contact our privacy team at privacy@hack51.africa or at our registered office. For general account support, email hello@hack51.africa.

This notice covers visits to Talent registration and sign-in screens and the processing involved in starting registration, authentication and recovery, onboarding and the private Talent Workspace, including My Profile and My Vision Board where available. We are launching the Talent account for adults in Nigeria. Challenge entry, submissions, assessment and employer disclosure are separate activities with their own rules, notices and steps where applicable. Account registration and onboarding do not authorise those activities.

2. Data, sources and why we use them

We receive information you provide and limited information from the services you use with your account. When you start email registration or choose a third-party sign-in, Base44 may create an authentication record before email verification, the age declaration or your agreement to the Talent Terms is complete. Starting registration lets us take steps to set up the account you request. Private Talent access begins only after the applicable identity verification, adult declaration and express acceptance of the Terms.

Data and source	How and why we use it	Lawful basis under the Nigeria Data Protection Act 2023
Email, account and identity-provider identifiers, verification or recovery status, and essential session identifiers	Set up the account you request, verify identity or email where applicable, sign you in, recover access and send necessary verification and recovery messages. Base44 manages email/password authentication. Keep passwords and one-time codes out of support messages.	Steps you request before the account contract and performance of the account contract
Your affirmative 18+ declaration, its version and time	Apply the adult eligibility rule and record the declaration. Standard signup requires neither a full date of birth nor a government ID.	Steps you request before entering into the account contract
Display name or handle and account setup status	Set up and show your private profile and keep track of whether you have completed account setup.	Performance of the account contract

Data and source	How and why we use it	Lawful basis under the Nigeria Data Protection Act 2023
Optional information you save, such as country, About text, interests, goals, focus areas, role level, industries, organisation types, development horizon and related preferences	Store and display your own information privately and let you update or remove it. You can skip optional fields.	Performance of the specific private account function you request
Vision Board notes or selections and any drafts you choose to save	Keep your own editable planning material and show it back to you privately.	Performance of the specific private account function you request
Limited technical records, which may include IP address, browser or session information, access or error events and timestamps	Diagnose faults, protect the service and accounts, and investigate abuse.	Our legitimate interests in operating and protecting the service, where necessary and consistent with your reasonable expectations and rights
Terms acceptance, notice presentation and any separate consent or withdrawal records	Administer the account agreement, document the choices you make, and comply with applicable recordkeeping duties.	Contract performance for administering the agreement. Legal obligation for records required by law. Legitimate interests for evidence needed for a specific dispute or claim, where justified.
Support messages, privacy requests, proportionate verification information and related records	Resolve account issues, respond to privacy requests, document action and handle complaints or claims.	Contract performance for account support. Legal obligation for statutory rights requests. Legitimate interests for necessary complaint or claim handling, where justified.

Email or a supported sign-in method, the necessary verification, adult declaration and Terms acceptance are required to activate access. A display name is required to complete general profile setup. Optional fields may be left blank. Keep passwords, official identifiers, sensitive details such as health information, and other people's private information out of optional fields. If we receive sensitive data unexpectedly, we limit access and assess lawful removal or restriction.

3. Optional preferences, personalisation and consent

We use your saved preferences and Vision Board entries to provide the private storage and display you request. You can edit or clear them. We do not use these entries in this account service for behavioural ranking, automated recommendations, marketing, advertising, AI enrichment or model training. Agreeing to the Terms is separate from any consent required for a specific use of personal data.

We will explain any future optional personalisation or direct marketing separately and ask you to opt in before that processing starts. You can withdraw consent as easily as you gave it. Withdrawal stops future processing that depends on consent and leaves core account functions available. Processing carried out lawfully before withdrawal remains lawful.

4. Visibility and recipients

My Profile, My Vision Board, saved preferences and any private onboarding previews are private to your account. Other participants, employers, sponsors and the public receive no access through this account service. Examples shown during onboarding are for orientation. Hack51 does not score or assess your

competence, make hiring decisions or use profiling to make decisions with legal or similarly significant effects in this account service. Account checks may prevent activation or access if verification, eligibility or Terms acceptance is incomplete. Contact us if you believe an account check was applied incorrectly and want a person to review it.

Authorised Hack51 staff may access the information they need for account support, operation, security or legal duties. Hosting, storage, authentication, essential email and related providers may receive the information needed to supply their services. Their subprocessors may provide infrastructure or technical services. We may disclose limited information to competent authorities where legally required and to professional advisers where necessary and lawful for advice or a legal claim.

5. Base44, authentication providers and international transfers

Wix.com Ltd. operates Base44, which provides managed hosting, storage, authentication and related account services. Wix acts as our processor when it processes Talent data on our behalf. If you choose Google sign-in, Google supplies account identity information needed to sign you in. Google's Privacy Policy explains the processing Google carries out for its own purposes. We identify any additional supported identity provider and link to its privacy information before you choose it.

Account information can be stored, accessed or otherwise processed outside Nigeria to deliver the services described above, including as part of hosting, authentication, support and backup. We use safeguards that meet Nigerian data protection law for those transfers. Contact privacy@hack51.africa for details of the destinations, recipients, applicable transfer safeguards and how to obtain information about them.

6. Retention, removal and account closure

Data	Retention criterion and deletion method
New, unverified or abandoned registration records	We keep them for the time needed to complete registration and protect it from misuse. If the account agreement is never formed, we delete personal data collected for those steps when no longer needed and within six months unless there is a justified need to keep a limited record for a future legal claim. We act sooner where required by law.
Active account identity and setup state	We keep the records needed to operate your account while it is active. On verified closure we end access and remove account records that are no longer needed. We instruct our processors to act on relevant copies.
Profile, Vision Board and preferences, including earlier revisions	We keep current entries while needed for the private features you request. Editing or clearing an entry changes what you see. Earlier versions may remain for a limited period where needed for a documented purpose. You can request erasure of those versions.
Diagnostic and security records	We keep them only for defined operational and security needs, or for the duration of a specific investigation or legal duty where that applies.
Terms acceptance, age declaration and notice or consent records	We keep the minimum needed to administer the account and demonstrate the choices made. After closure, we keep only any limited evidence required by law or justified for a specific dispute or legal claim.
Support and privacy requests	We keep these for the time needed to handle and document the request, subject to any specific legal duty or justified legal claim.

Data	Retention criterion and deletion method
Provider backups and deleted-item recovery copies	Copies may persist for the provider's limited recovery and backup cycle. We restrict access to those copies and apply outstanding deletions before restored data returns to ordinary use. Contact us for the period that applies to your account.

Email privacy@hack51.africa to request closure or erasure. We may verify your identity before acting. We erase personal data without undue delay where required by law. Unless a specific legal period or lawful exception applies, we keep personal data no longer than six months after its original purpose is fulfilled, and delete sooner when it is no longer needed. Where a lawful exception applies, we keep only what is necessary, restrict its use, review the need and delete it when the basis ends. We will explain the reason and applicable period or criterion when the law allows.

7. Your rights and choices

You can ask us to confirm whether we process your personal data, tell you the purposes, categories, recipients, retention and available source information, and give you a copy. You can request correction of inaccurate, out-of-date, incomplete or misleading data, or deletion where correction is unsuitable. You can request erasure or restriction where applicable and object to processing. Where portability applies to data you provided under consent or for contract performance, you can request it in a structured, commonly used, machine-readable format or ask us to send it directly to another controller where technically possible. You can withdraw consent at any time and object to direct marketing, which must then stop. For a solely automated decision with legal or similarly significant effects, you may have the right to human intervention, to explain your view and to challenge the decision.

Use the available Profile and Vision Board controls to edit or clear displayed information. Email privacy@hack51.africa for rights requests, including for earlier revisions or after account closure. We verify identity only as needed and act without unreasonable delay and within any applicable deadline. If the law permits us to restrict or refuse a request, we will explain the reason and the options available to you.

You may contact the Nigeria Data Protection Commission directly, including through its services portal, and pursue other available remedies. You can complain to the Commission without contacting Hack51 first.

8. Security, adults-only access and changes to this notice

We use access restrictions and other technical and organisational safeguards appropriate to the risks. If a breach is likely to pose a high risk to you, we will inform you immediately as required by law. Report concerns to privacy@hack51.africa. The Talent account is for people aged 18 or over. If we discover that a child has started registration or obtained access, we restrict the account, assess the processing, and erase data we have no lawful reason to retain. A parent's permission does not make a child eligible for a Talent account.

We may update this notice when the service, processing or law changes. We will identify the version and effective date and explain material changes before the affected processing starts. A new use needs its own lawful basis. Where consent is required, we will ask for your separate choice before starting that use.